### UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA 25-CR-20237-GAYLES/GOODMAN

CASE NO.

52 U.S.C. § 20511(2)(B) 18 U.S.C. § 611(a) 18 U.S.C. § 1015(a)

UNITED STATES OF AMERICA

V.

GORDON LOUIS,

Defendant.

FILED BY BM D.C.

May 22, 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

#### **INDICTMENT**

The Grand Jury charges that:

# COUNT 1 Casting a False Ballot (52 U.S.C. § 20511(2)(B))

On or about October 31, 2020, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

#### GORDON LOUIS,

knowingly and willfully deprived, defrauded, and attempted to deprive and defraud the residents of the State of Florida of a fair and impartially conducted election process by casting a ballot that he knew to be materially false and fraudulent under Florida law in an election for federal office, in violation of Title 52, United States Code, Section 20511(2)(B).

COUNT 2 Voting By an Alien (18 U.S.C. § 611(a))

On or about October 31, 2020, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

#### GORDON LOUIS,

an alien, did knowingly vote in an election held in part for the purpose of electing a candidate for

the office of President, Vice President, and Member of the House of Representatives, in violation of

Title 18, United States Code, Section 611(a).

COUNT 3

False Statement Related to Naturalization

(18 U.S.C. § 1015(a))

On or about October 28, 2023, in Miami-Dade County, in the Southern District of Florida,

and elsewhere, the defendant,

**GORDON LOUIS,** 

did knowingly make a false statement under oath, in a case, proceeding, and matter relating to,

under, and by virtue of any law of the United States relating to naturalization and citizenship, that

is, the defendant represented to the United States Citizen and Immigration Services on his N-400

Application for Naturalization that he had never claimed to be a U.S. citizen (in writing or any other

way), when in truth and in fact, and as the defendant then and there well knew, he had previously

claimed to be a U.S. citizen, in violation of Title 18, United States Code, Section 1015(a).

A TRUE BILL

FOREPERSON

HAYDEN P. O'BYRNE

UNITED STATES ATTORNEY

CHRISTOPHER JONES

ASSISTANT UNITED STATES ATTORNEY

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# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA		CASE NO.: <u>25-CR-20237-GAYLES/GOODMAN</u>	
v. GORDON LOUIS,		CERTIFICATE OF TRIAL ATTORNEY	
	Defendant.  t Division (select one)  Miami Key West FTP  FTL WPB	New Defendant(s) (Yes or No) Number of New Defendants Total number of new counts	
I do h	ereby certify that:		
1.	I have carefully considered the allegations witnesses and the legal complexities of the I am aware that the information supplied on	of the Indictment, the number of defendants, the number of probable Indictment/Information attached hereto. this statement will be relied upon by the Judges of this Court in setting Is under the mandate of the Speedy Trial Act, 28 U.S.C. §3161.	
3.	Interpreter: (Yes or No) No  List language and/or dialect:		
4. 5.	I       ✓ 0 to 5 days       ☐ Pe         II       ☐ 6 to 10 days       ☐ Mi	ype of offense listed below: neck only one) tty inor isdemeanor	
6.	Has this case been previously filed in the If yes, Judge	`	
7.	Has a complaint been filed in this matter. If yes, Judge	r? (Yes or No) No	
8.	Does this case relate to a previously file	d matter in this District Court? (Yes or No) No Case No	
9.	Defendant(s) in federal custody as of N	/A	
10.	Defendant(s) in state custody as of $N/A$		
11.	Rule 20 from the District of		
12.	Is this a potential death penalty case? (Y	·	
13.	prior to October 3, 2019 (Mag. Judge Ja	ending in the Central Region of the U.S. Attorney's Office	
14.	Did this matter involve the participatio	n of or consultation with Magistrate Judge Eduardo I. Sanchez Office, which concluded on January 22, 2023? No	
15.	Did this matter involve the participati	on of or consultation with Magistrate Judge Marty Fulgueira Attorney's Office, which concluded on March 5, 2024? No	
16.	Did this matter involve the participation	on of or consultation with Magistrate Judge Ellen F. D'Angelo Office, which concluded on October 7, 2024? No	
		By:	
		Christopher Jones	
		Assistant United States Attorney	

SDFL Court ID No. A5503315

## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA

#### PENALTY SHEET

Defendant's Name: GORDON LOUIS		
Case No:		
Case 110.		
Count 1:		
Casting a Falsa Pallat		
Casting a False Ballot		
Title 52, United States Code, Section 20511(2)(B)		
* Max. Term of Imprisonment: 5 years		
* Mandatory Min. Term of Imprisonment (if applicable): N/A		
* Max. Supervised Release: 3 years		
* Max. Fine: \$250,000		
Count 2:		
Unlawful Voting by an Alien in Presidential Election		
Title 18, United States Code, Section 611(a)		
* Max. Term of Imprisonment: 1 years		
* Mandatory Min. Term of Imprisonment (if applicable): N/A		
* Max. Supervised Release: 1 year		
* Max. Fine: \$100,000		
Count 3:		
False Statement Related to Naturalization		
Title 18, United States Code, Section 1015(a)		
* Max. Term of Imprisonment: 5 years		
* Mandatory Min. Term of Imprisonment (if applicable): N/A		
* Max. Supervised Release: 3 years		
* Max. Fine: \$250.000		

<sup>\*</sup>Refers only to possible term of incarceration, supervised release, and fines. It does not include restitution, special assessments, parole terms, or forfeitures that may be applicable.